

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
Individually and as Parent and Legal Guardian)
of W.W., K.W., G.W., and L.W., minor children,)
and MATTHEW WADSWORTH,)

Plaintiffs,

V.

WALMART INC. and JETSON ELECTRIC
BIKES, LLC,

Defendants.

Case No. 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

**DECLARATION OF EUGENE M. LAFLAMME IN SUPPORT OF
DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR
PROTECTIVE ORDER AS TO THE DEPOSITIONS OF
PLAINTIFFS' MINOR CHILDREN**

STATE OF WISCONSIN)
)
COUNTY OF WAUKESHA)

Eugene M. LaFlamme, the affiant herein, having been duly sworn, states upon oath:

1. I am an attorney duly licensed and authorized to practice law in the state of Wisconsin as a Partner with the law firm of McCoy Leavitt Laskey LLC and am one of the attorneys of record representing Walmart Inc. and Jetson Electric Bikes, LLC in this case. I am admitted Pro Hac Vice in this matter.

2. I make this Declaration on the basis of my personal knowledge of the facts set forth herein.

3. Attached hereto as Exhibit A is a true and correct copy of pertinent pages from the transcript of Stephanie Wadsworth's February 27, 2024 deposition.

4. Attached hereto as Exhibit B is a true and correct copy of pertinent pages from the transcript of Matthew Wadsworth's February 26, 2024 deposition.

5. Attached hereto as Exhibit C is a true and correct copy of Deposition Exhibit 18A.

6. Attached hereto as Exhibit D is a true and correct copy of pertinent pages from the transcript of Jeff Sheaman's November 16, 2023 deposition.

7. Attached hereto as Exhibit E is a true and correct copy of Deposition Exhibit 29.

8. Attached hereto as Exhibit F is a true and correct copy of *Kuyper v. Board of County Comm. Of Weld County*, 2010 WL 4038831 (D. Colo. 2010).

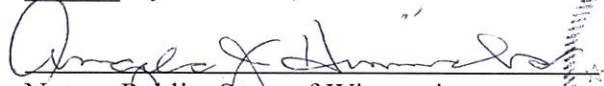
9. Attached hereto as Exhibit G is a true and correct copy of *Halley v. State of Oklahoma*, 2016 WL 4995393 (E.D. Okla. 2016).

10. Attached hereto as Exhibit H is a true and correct copy of *Edgin v. Blue Valley*, 2021 WL 1750861 (D. Kan. 2021).

Dated: March 22, 2024


Eugene M. LaFlamme

Subscribed and sworn to before me this
22 day of March, 2024.


Notary Public, State of Wisconsin
My Commission expires: 5-18-26

